

1 Hal Taylor, Esq.
2 Of Counsel, Olinsky Law Group
3 NV Bar No.: 4399
4 2551 West Lakeridge Shores
5 Reno, NV 89519
6 Tel: (775) 825-2223
7 Fax: (775) 329-1113
8 Email: HalTaylorLawyer@gbis.com
9 Attorney for Plaintiff

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CATHERINE O.,)
Plaintiff,) CASE NO.
v.) 2:22-cv-01870-BNW
KILOLO KIJAKAZI, ACTING) **CONSENT MOTION**
COMMISSIONER OF SOCIAL SECURITY,) **FOR EXTENSION OF TIME TO FILE**
Defendant.) **PLAINTIFF'S BRIEF**

Plaintiff by her attorney, moves for a sixty-one (61) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed May 24, 2023.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between May 19, and July 14, 2023, staff in Counsel's office have one hundred and ninety-five (195) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue

1 hardship. This extension is needed to thoroughly and properly prepare the brief by the current
2 deadline.

3 Wherefore, Plaintiff requests an extension from May 24, 2023, up to and including July
4 24, 2023 to file her brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who
5 kindly has no objection to this request.

6
7 Dated May 22, 2023.

8
9 Respectfully submitted,

10
11
12 /s/Hal Taylor
13 Hal Taylor, Esq.

14
15
16 **Plaintiff's Certificate of Service:**

17 I certify that I caused the Consent Motion for Extension of Time to be served today, May
18 22, 2023, by CMECF to Blaine T. Welsh, and L. Jamala Edwards, who are filing users of the
19 CM/ECF system.

20
21
22
23
24 /s/Hal Taylor
25 Hal Taylor

26
27
28 **IT IS SO ORDERED**

DATED: 2:37 pm, May 23, 2023



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE